

# **EXHIBIT 2**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X Index No.: 190195-17  
FREDERICK G. BROWN and DIANA BROWN,

Date Filed:

Plaintiff(s),

Plaintiff Designates

**NEW YORK**

County as the Place of Trial

-against-

The Basis of Venue is  
Defendants' Place of Business

AMCHEM PRODUCTS, INC.,  
n/k/a RHONE POULENC AG COMPANY,  
n/k/a BAYER CROPSCIENCE INC.,  
AMERICAN BILTRITE INC.,  
AURORA PUMP COMPANY,  
BIRD INCORPORATED,  
BLACKMER,  
BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES,  
CBS CORPORATION, f/k/a VIACOM INC.,  
successor by merger to  
CBS CORPORATION, f/k/a  
WESTINGHOUSE ELECTRIC CORPORATION,  
CERTAINTIED CORPORATION,  
CLEAVER BROOKS COMPANY, INC.,  
DAP, INC.,  
EATON CORPORATION, as successor -in-interest to  
CUTLER-HAMMER, INC.,  
FORD MOTOR COMPANY,  
FOSTER WHEELER, L.L.C.,  
GARDNER DENVER, INC.,  
GENERAL ELECTRIC COMPANY,  
GEORGIA PACIFIC LLC.,  
GOODYEAR CANADA, INC.,  
GOULDS PUMPS LLC,  
HONEYWELL INTERNATIONAL, INC.,  
f/k/a ALLIED SIGNAL, INC. / BENDIX,  
IMO INDUSTRIES, INC.,  
KARNAK CORPORATION,  
LEVITON MANUFACTURING CO., INC.,  
OWENS-ILLINOIS, INC.,  
PFIZER, INC. (PFIZER),  
THE GOODYEAR TIRE AND RUBBER COMPANY,  
U.S. RUBBER COMPANY (UNIROYAL),  
UNION CARBIDE CORPORATION,  
WARREN PUMPS, LLC,  
**AIR & LIQUID SYSTEMS CORPORATION,**  
**as successor-by-merger to BUFFALO PUMPS, INC.,**  
**BORGWARNER MORSE TEC LLC.,**

**SUPPLEMENTAL  
SUMMONS**

Defendants

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To the above named Defendant(s)

**You are hereby summoned** to answer the **amended verified** complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated, October 06, 2017  
New York, New York

Defendant's address:

**SEE ATTACHED DEFENDANTS RIDER**

WEITZ & LUXENBERG, P.C.  
Attorney(s) for Plaintiff  
Post Office Address  
700 Broadway  
New York, New York 10003  
(212) 558-5500

**DEFENDANTS' RIDER**

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 Attorneys for Defendant:

**AMCHEM PRODUCTS, INC.,  
 n/k/a RHONE POULENC AG COMPANY,  
 n/k/a BAYER CROPSCIENCE INC.  
 CERTAINTED CORPORATION  
 UNION CARBIDE CORPORATION**

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 Attorneys for Defendant:  
**AURORA PUMP COMPANY  
 BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES  
 GARDNER DENVER, INC.**

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 Attorneys for Defendant:  
**BIRD INCORPORATED**

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**CBS CORPORATION, f/k/a VIACOM INC.,  
successor by merger to  
CBS CORPORATION, f/k/a  
WESTINGHOUSE ELECTRIC CORPORATION  
FOSTER WHEELER, L.L.C.  
GENERAL ELECTRIC COMPANY**

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Attorneys for Defendant:  
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Nancy McDonald Esq.  
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Attorneys for Defendant:  
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CUTLER-HAMMER, INC.**

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Attorneys for Defendant:  
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Attorneys for Defendant:  
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GOODYEAR CANADA, INC.  
THE GOODYEAR TIRE AND RUBBER COMPANY**

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f/k/a ALLIED SIGNAL, INC. / BENDIX**

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**WARREN PUMPS, LLC**

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 Attorneys for Defendant:  
**PFIZER, INC. (PFIZER)**

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fax:(212) 818-1264  
Attorneys for Defendant:

**U.S. RUBBER COMPANY (UNIROYAL)**

**AIR & LIQUID SYSTEMS CORPORATION,**  
**as successor-by-merger to BUFFALO PUMPS, INC.**  
CT Corporation System  
116 Pine Street, Suite 320  
Harrisburg, PA 17101

**BORGWARNER MORSE TEC LLC.**  
CT Corporation  
1209 Orange Street  
Wilmington, DE 19801



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK-----X Index No: 190195-17  
FREDERICK G. BROWN and DIANA BROWN,

Date Filed:

Plaintiff(s),

-against-

**AMENDED  
VERIFIED  
COMPLAINT**

AMCHEM PRODUCTS, INC.,  
     n/k/a RHONE POULENC AG COMPANY,  
     n/k/a BAYER CROPSCIENCE INC.,  
 AMERICAN BILTRITE INC.,  
 AURORA PUMP COMPANY,  
 BIRD INCORPORATED,  
 BLACKMER,  
 BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES,  
 CBS CORPORATION, f/k/a VIACOM INC.,  
     successor by merger to  
     CBS CORPORATION, f/k/a  
     WESTINGHOUSE ELECTRIC CORPORATION,  
 CERTAINTED CORPORATION,  
 CLEAVER BROOKS COMPANY, INC.,  
 DAP, INC.,  
 EATON CORPORATION, as successor -in-interest to  
     CUTLER-HAMMER, INC.,  
 FORD MOTOR COMPANY,  
 FOSTER WHEELER, L.L.C.,  
 GARDNER DENVER, INC.,  
 GENERAL ELECTRIC COMPANY,  
 GEORGIA PACIFIC LLC.,  
 GOODYEAR CANADA, INC.,  
 GOULDS PUMPS LLC,  
 HONEYWELL INTERNATIONAL, INC.,  
     f/k/a ALLIED SIGNAL, INC. / BENDIX,  
 IMO INDUSTRIES, INC.,,  
 KARNAK CORPORATION,  
 LEVITON MANUFACTURING CO., INC.,  
 OWENS-ILLINOIS, INC.,  
 PFIZER, INC. (PFIZER),  
 THE GOODYEAR TIRE AND RUBBER COMPANY,  
 U.S. RUBBER COMPANY (UNIROYAL),  
 UNION CARBIDE CORPORATION,  
 WARREN PUMPS, LLC,  
**AIR & LIQUID SYSTEMS CORPORATION,**  
     **as successor-by-merger to BUFFALO PUMPS, INC.,**  
**BORGWARNER MORSE TEC LLC.,**

**PLAINTIFF DEMANDS  
TRIAL BY JURY**

Defendants

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Plaintiff(s), FREDERICK G. BROWN and DIANA BROWN, by their attorneys, WEITZ & LUXENBERG, P.C., upon information and belief, at all times hereinafter mentioned alleges as follows:

1. Plaintiff(s), FREDERICK G. BROWN and DIANA BROWN, by their attorneys, WEITZ & LUXENBERG, P.C., for their **amended verified complaint** respectfully alleges:
2. @Defendant AIR & LIQUID SYSTEMS CORPORATION, as successor-by-merger to BUFFALO PUMPS, INC., was and still is a duly organized domestic corporation doing business in the State of New York.
3. Defendant AMERICAN BILTRITE INC., was and still is a duly organized domestic corporation doing business in the State of New York.
4. Defendant AURORA PUMP COMPANY, was and still is a duly organized domestic corporation doing business in the State of New York.
5. Defendant BIRD INCORPORATED, was and still is a duly organized domestic corporation doing business in the State of New York.
6. Defendant BLACKMER, was and still is a duly organized domestic corporation doing business in the State of New York.
7. Defendant BW/IP, INC. AND ITS WHOLLY OWNED SUBSIDIARIES, was and still is a duly organized domestic corporation doing business in the State of New York.
8. Defendant DAP, INC., was and still is a duly organized domestic corporation doing business in the State of New York.
9. Defendant EATON CORPORATION, as successor -in-interest to CUTLER-HAMMER, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

10. Defendant GARDNER DENVER, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

11. Defendant GEORGIA PACIFIC LLC., was and still is a duly organized domestic corporation doing business in the State of New York.

12. Defendant IMO INDUSTRIES, INC., was and still is a duly organized domestic corporation doing business in the State of New York.

13. Defendant KARNAK CORPORATION, was and still is a duly organized domestic corporation doing business in the State of New York.

14. Defendant LEVITON MANUFACTURING CO., INC., was and still is a duly organized domestic corporation doing business in the State of New York.

15. Defendant WARREN PUMPS, LLC, was and still is a duly organized domestic corporation doing business in the State of New York.

Plaintiff(s), FREDERICK G. BROWN and DIANA BROWN, repeats and realleges  
NYCAL - WEITZ & LUXENBERG, P.C. STANDARD ASBESTOS COMPLAINT FOR  
PERSONAL INJURY No. 7 as if fully incorporated herein as it pertains to the defendants in the  
aforementioned caption.

Dated: October 06, 2017  
New York, New York

Yours, etc.,

WEITZ & LUXENBERG, P.C

Attorneys for Plaintiff(s)  
700 Broadway  
New York, NY 10003  
(212) 558-5500

STATE OF NEW YORK     )  
   SS:  
 COUNTY OF NEW YORK )

The undersigned, an attorney admitted to practice in the Courts of New York State,  
 shows:

Deponent is an Associate of the firm WEITZ & LUXENBERG, P.C., Counsel for the  
 plaintiff(s) in the within action; deponent has read the foregoing **supplemental summons and  
 amended verified complaint** and knows the contents thereof; the same is true to deponent's own  
 knowledge, except as to the matters therein stated to be alleged on information and belief, and  
 that as to those matters deponent believes it to be true. This verification is made by deponent  
 and not by plaintiff(s) because plaintiff(s) resides outside of the County of New York where  
 plaintiffs' counsel and deponent maintain their office.

Dated: October 06, 2017  
 New York, New York

/S/

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PATRICK FINLEY

Index No.: 190195-17

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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FREDERICK G. BROWN and DIANA BROWN,

Plaintiff(s),

-against-

AIR & LIQUID SYSTEMS CORPORATION,  
as successor-by-merger to BUFFALO PUMPS, INC., et. al.,

Defendants.

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**SUPPLEMENTAL SUMMONS and AMENDED VERIFIED COMPLAINT**

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**WEITZ & LUXENBERG, P.C.**  
Attorneys for PLAINTIFFS  
**700 Broadway**  
**New York, NY 10003**  
**212-558-5500**

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To  
Attorney(s) for

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Service of a copy of the within  
is hereby admitted.

Dated,  
October 06, 2017

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**Attorney(s) for**

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